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August 8, 2008

Via Facsimile (212) 805-6304
 Judge Paul A. Crotty
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

RE: Acosta v. ASMORG et al.
07 CIV 6326 (PAC) (FM)

Dear Judge Crotty:

We represent plaintiff in the above captioned matter. Discovery has been moving forward in the case and the parties have now completed the depositions of a representative of all parties as well as three non-party depositions. Additional discovery demands have been set forth between the parties and the parties are presently determining whether additional depositions will be needed. The date for the completion of all depositions is today, August 8, 2008. In light of the present cut-off date for depositions herein, we respectfully request that the deposition for the completion of all depositions be extended up to and including the final day of discovery which is presently scheduled for September 8, 2008.


I have consulted with counsel for defendant ASMORG and they join in and consent to this request. Both Counsel for ASMORG and myself have previously spoken with counsel for American Airlines regarding the production of an additional witness from American Airlines. I have attempted to contact Ms. Mulderig, counsel for American Airlines, but she is in an all day deposition and I have not been able to speak with her yet. As the deadline is today I thought it best to get the application to chambers as soon as possible. Any consideration that the court can give to this request is appreciated. Thank you for your courtesies in this matter.

Very Truly Yours,

Marschhausen & Fitzpatrick, P.C.



Dirk Marschhausen

SO ORDERED: AUG 11 2008

 HON. PAULA A. CROTTY
 UNITED STATES DISTRICT JUDGE

MEMO ENDORSED

MEMO ENDORSED

cc:

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